

Exhibit 13

DECLARATION OF STEVEN URY

I, Steven K. Ury, declare as follows:

1. I am the General Counsel of the Service Employees International Union (SEIU). I submit this declaration based on my personal knowledge, SEIU's business records, and public records in SEIU's possession.
2. SEIU is a labor union of approximately two million workers who provide public services, healthcare, and property services. SEIU is an independent nonprofit organization constituted under Section 501(c)(5) of the Internal Revenue Code, with over 150 affiliates across the United States, Canada, and Puerto Rico.
3. SEIU's work is guided by our vision for a just society where all workers are valued and all people respected—no matter where we are from or the color of our skin, where all families and communities can thrive, and where we leave a better and more equitable world for generations to come. See SEIU 2024 Constitution and Bylaws, SEIU Mission Statement 5, available at <https://www.seiu.org/cards/what-you-should-know-about-our-constitution-and-leaders/you-can-read-it-yourself/p3>
4. Nearly 300,000 of SEIU's members work for public school districts or institutions of higher education. SEIU represents approximately 165,000 public school employees in K-12 districts across the country, including rural school districts, with bargaining units that include professionals, paraprofessionals, administrative employees, janitors, bus drivers, food service employees, and other educational support staff. We also represent approximately 132,000 higher education employees, including faculty, librarians,

counselors, student workers, administrative employees, food service employees, and janitors at colleges and universities.

5. In Massachusetts, SEIU represents approximately 7,000 education workers. This includes sixteen K-12 school districts, where SEIU Local 888 represents paraprofessionals and support staff, including paraeducators, therapists, behavioral technicians, and administrative and clerical employees. SEIU Locals 888, 509, and 32BJ represent higher education members in Massachusetts, including graduate student workers, undergraduate resident assistants, adjunct faculty, other professional employees, administrative and clerical employees, and janitors at colleges and universities.
6. Our education members' employers—and, accordingly, our members themselves—rely on several streams of federal funding to support the academic, physical, and social-emotional needs of students, as well as maintain the working conditions, compensation, and professional development of educators and support staff.
7. Without an effective federal Department of Education, educators and support staff—including SEIU members—will be harmed. SEIU members directly rely on a number of programs by the Department of Education, and would suffer considerable harm if the Department cut or ceased operations.
8. SEIU's members who work as therapists, paraeducators, behavioral technicians, instructional assistants, therapist assistants, and other support staff for special education programs depend on federal funding pursuant to the Individuals with Disabilities Act (IDEA). For example, Massachusetts school districts that employ SEIU Local 888 educators and support staff in special education settings receive IDEA funding, including Holyoke, Hopkinton, Lawrence, Marlborough, Millbury, Quincy, Scituate, and

Wachusett School Districts. IDEA funding is used to support salaries, professional development and continuing education, and critical classroom resources and technology.

In Hopkinton School District, where SEIU Local 888 represents a bargaining unit of approximately 100 teaching assistants and paraprofessionals, the District's \$977,466 IDEA allotment includes funding five full-time paraprofessional positions to provide Applied Behavior Analysis (ABA) therapy for students with disabilities. In Quincy School District, where SEIU Local 888 represents a bargaining unit of approximately 150 paraprofessional positions, the District's \$2.89 million IDEA allotment includes funding for 27 full-time employee positions for special education, ensures that each paraprofessional employee receives 12 hours of training and development per year, and pays for Board Certified Behavioral Analysts to supervise paraprofessionals who are working to become Registered Behavior Technicians.

9. IDEA funding contributes to salaries and professional development for SEIU members (such as paraeducators, ABA therapists, Registered Behavioral Technicians, instructional assistants, physical therapists, occupational therapists, speech and pathology therapist assistants, and other therapist assistants) and special education programs' curriculum development and equipment.
10. SEIU members' positions are essential to supporting the academic and academically related needs of students with disabilities, many of whom are also low-income. For example, special education paraprofessionals help students with disabilities navigate school and access the same rigorous curriculum as their peers with specialized physical, medical, and instructional supports, including in some cases one-on-one assistance.

11. If IDEA funding were cut, delayed, or otherwise impeded or redirected, the impact on our members and the students they serve would be devastating.
12. In addition to losing positions funded by IDEA, there would be downstream effects on the remaining educators and support staff in the district. Staff would be forced to do more with less, due to larger class sizes, larger caseloads, and more demands on their time.
13. This would worsen working conditions for educators and support staff, who already face challenges from staffing shortages and high vacancy rates. It is likely that highly skilled and experienced educators and support staff would leave the profession as a result of the job and service cuts, increasing attrition rates.
14. Disruption to special education programs and cuts to program staff would have a detrimental impact on the quality of services for students. Students with disabilities would be denied the support they need to participate in school fully and access the curriculum.
15. SEIU represents K-12 employees who work in rural school districts. For example, SEIU Local 284 represents K-12 paraprofessionals, bus drivers, buildings and grounds, maintenance, clerical, and food service employees in Minnesota, with bargaining units at approximately 77 school districts throughout the state. Over a third of these—29 districts—are classified by Minnesota as rural school districts eligible for participation in the Rural Education Achievement Program (REAP). Rural school districts generally have a smaller tax base and greater transportation challenges than other districts; they, and their employees, will be uniquely impacted by disruption or cuts to federal funding.
16. In sum, if federal funding to schools is impeded, delayed, or cut, many of our members whose salaries or programs are subsidized by the Department of Education's funding

streams will be at risk of losing their jobs (and, accordingly, the salaries and health benefits they rely on to support themselves and their families). This would have a devastating, cascading effect on their co-workers, schools, students, and SEIU as an organization.

17. SEIU also represents state employees in fifteen states, including Massachusetts. SEIU members who work for state departments of education, such as Massachusetts's Department of Secondary Education (DESE), are responsible for ensuring compliance with federal and state requirements, and work with school districts in their states and the federal Department of Education to implement and allocate federal funding granted to the State—including funding under Title I, the Rural and Low-Income School Program (RLIS), and Career Technical Education (CTE). State education department staff rely on technical assistance and expertise from the federal Department of Education in developing and implementing federally-funded state programs. Losing federal Department of Education employees' guidance would hurt state employees' abilities to do their jobs and support school districts in their states.
18. Many of SEIU's members rely on or have relied on federal student aid. For example, many of the essential healthcare and social service professions that SEIU represents, including doctors, nurses, and social workers, have high rates of reliance on federal aid to earn their professional degrees. Additionally, many graduate and undergraduate student worker members currently rely on federal student aid to afford their education, and will be harmed by changes to or administrative delays in the Department's processing of student loan applications, certification of institutions, and guidance on and management of loan repayment programs.

19. One of SEIU's local unions that represents student workers is the California State University Employees Union, Local 2579 (CSUEU). CSUEU represents a bargaining unit of student assistants at California State University (CSU). Approximately 30,000 students, primarily undergraduates, work as student assistants during the course of an academic year. Thousands of these student assistants rely on aid via federal work study positions.
20. These student workers are also able to rely on the investigation and complaint procedures operated by the Department's Office for Civil Rights which investigates and resolves complaints of discrimination and harassment. SEIU's members who are student workers – as well as students more broadly – will be harmed if these complaint and investigation processes are less effective or less timely.
21. The Federal Work Study (FWS) program pays for part-time employment for students with high financial need who maintain satisfactory academic progress. Students apply for FWS by completing the Department of Education's Free Application for Federal Student Aid (FAFSA). Recent data suggests that, for low-income undergraduate students at public universities, participating in FWS improves academic outcomes and rates of graduation.
22. CSUEU's student assistant members rely on federal work study and other federal student aid to afford tuition, food, rent, other living expenses, and transportation to off-campus internships. CSUEU's members in other bargaining units, such as library services specialists, lab technicians, information technology consultants, and administrative analysts, often work along-side FWS positions and will be harmed as well if FWS is disrupted, from understaffing and increased workloads in their departments.

23. CSUEU's members have made decisions about pursuing education based on the Public Service Loan Forgiveness (PSLF) program. CSUEU member Catherine Hutchinson is an Instructional Support Technician in the Biology Department at CSU Channel Islands. She has previously been enrolled in PSLF and recently took out further loans to pursue a master's degree, in reliance on continued participation in PSLF. Another CSUEU member who is a graduate student at CSU's Northridge Campus also recently took out loans to pursue a masters degree in education in order to become a teacher, based on her reliance that she could enter the PSLF program.
24. In order to respond to members' questions about federal student aid and to support members who want to pursue careers in public service, SEIU has provided education and assistance to members about federal student aid and loan repayment options, including guidance on the PSLF application process.
25. SEIU has held student debt clinics for its members in-person and online. To create the content for these clinics, SEIU relies heavily on technical assistance provided by the Department of Education—such as guidance documents, loan repayment calculators on the Department's website, instructions, and more—that are designed to advise borrowers regarding which student loan forgiveness program to enroll in. SEIU has also relied on Department of Education employees' assistance in developing content and materials for these clinics, including presenting information directly to members at national webinars in 2022 and 2023.

Executed on March 28, 2025.

/s/ Steven K. Ury
Steven K. Ury